

**EXHIBITS TO RELATORS JOHN KING AND JANE DOE'S
FIFTH AMENDED COMPLAINT**

Exhibit No.	Description
1	07/26/00 memo from David Neuberger, Senior Internal Auditor for Solvay America, to Bob Solheim, Vice President of Finance and Administration for Solvay Pharmaceuticals, and others re: questionable reimbursable expenses in Innovex audit of sales representatives (KD00703 – KD00709)
2	05/09/99 Solvay Pharmaceuticals/Solvay S.A. press release re: safety of Luvox. Mentions Eric Harris and the Columbine tragedy (D006175 – D006177)
3	Review and Evaluation of Clinical Data of Luvox
4	Luvox label (KD00932 – KD00935)
5	Promotional Materials Request for Approval – OCD Compendium for Primary Care (SOLCID0014912 – SOLCID0014920)
6	December 1994 letter from FDA to Florence Gilson re: changes to language in Luvox promotional materials (SOLCID0012629 – SOLCID0012639)
7	PowerPoint presentation “Selling Luvox to Primary Care Physicians” (K00727 – K00731)
8	Solvay Workshop Materials – Mental Health MAP 2 Workshop (Luvox Tablets) (SOLCID0015206 – SOLCID0015228)
9	Luvox and Lithobid DVD
10	05/02/97 email from Bruce Birtwell to John King and Tom Dovel congratulating Luvox/Lithobid video (K1888)
11	04/20/99 email re: Luvox marketing strategies (KD00859 – KD00860)
12	S.O.A.P. Case Presentation (K00134 – K00140)
13	Various call notes re: Luvox
14	Presentation used at Charlotte POA meeting re: Luvox marketing (K00696-K00705 and K00734 – K00737)
15	Documents re: Luvox Distance Learning schedule (SOLCID0014652 – SOLCID0014659)
16	04/02/96 memo from Kathleen Milligan to Mental Health Group with script of Luvox presentation discussing OCD market (SOLVACID0012901 – SOLVACID0012910)
17	Luvox Psychiatry POA I 2000 Brand Data Sheet (SOLCID0021200 – SOLCID0021203)
18	Summary chart of representative examples of Luvox off-label prescriptions
19	July 1999 letter from FDA to Matthew Weinberg stating that Solvay's proposed promotional materials contain misleading information re: Aceon being used to treat arterial wall compliance. (SOLCID0157877 – SOLCID0157881)
20	02/05/02 email from James Maxson to reps re: ICD-9 codes. Email states that Aceon does not have an indication for Arterial Wall Compliance. (SOLCID0172422 – SOLCID0172423)

21	Cardiovascular Managed Care Advisory Board Final Report presented by MediMedia Managed Care, LLC (K2097 – K2119)
22	Aceon Message Refinement sales aid (K00593 and KD00579.1 – KD00604)
23	12/07/00 email from Lynda Dobson re: Message Implementation Teleconference with John King and Tom Dovel (K1080)
24	Memo from Doug Haling to Steve Jennings and Jim Hynd re: ACEON Message refinement (SOLCID0049093)
25	Certificate of Appreciation awarded to John King for developing the Aceon Refinement Message (KD00170)
26	2001 Business Plan – Aceon (SOLCID0049266 – SOLCID0049272)
27	Atlanta PCD District 2001 Business Plan. Tells reps to utilize Medicaid stickers where appropriate. (K00457 – K00484)
28	New Orleans District Marketing Plan POA I 2001 (K00384 – K00386)
29	11/10/00 email from Lisa Cooper to John King and Tom Dovel discussing success when using Aceon refinement message (K1076)
30	10/31/01 email from John Hepfer to John King re: market research results from The Hypertension Market Study (K00534)
31	03/12/03 memo from Bob Solheim, Steve Jennings & Alan Ryan to the Aceon file re: forecasts for Aceon. Discusses PROGRESS study (SOLCID0049255 – SOLCID0049259)
32	Lancet study results on the PROGRESS clinical study (SOLCID0054944 – SOLCID0054954)
33	Email chain re: Androgel PC Core Message and Selling Points (KD00071 – KD00072)
34	PROGRESS Planning/ Implementation chart (D00183)
35	Representative/Professional Services Associate Evaluation Form – Speaker was Dr. Ninety-two (SOLCID0108076 - SOLCID0108077, SOLCID0108084 – SOLCID0108085, SOLCID0108090, SOLCID0108094)
36	Summary chart of representative example prescriptions by certain physicians
36a	Summary chart of Aceon prescriptions for diabetic patients
36b	Summary chart of Aceon prescriptions for stroke patients
37	10/05/00 email from John Hepfer re: physician speakers for the AWC Program with list of attendees and future potential speakers. (SOLCID0093082 –SOLCID0093088)
38	List of Southwest Region check requests for payment to physician speakers (SOLCID0011001, SOLCID0047089 – SOLCID0047090 & SOLCID0066980)
39	Androgel Label (KD00889 – KD00907)
40	PowerPoint “Male Hypogonadism: Prevalence, Diagnosis, Consequences, and Treatment Strategies” (KD00940 – KD00988)
41	2003 Brand Data Summary for Androgel (SOLCID0076346 – SOLCID0076354 and SOLCID0024974)
42	03/11/02 monthly report from Jim Prasch to Ann Willmoth. Discusses

	PROGRESS status (K1081 – K1091)
43	04/12/00 letter from FDA to Unimed re: misleading statements in proposed Androgel promotional materials (SOLCID0162632 – SOLCID016238)
44	Medical Education Transition report prepared by EDU-Medical Management, Inc. for Solvay (SOLCID0070823 – SOLCID0070851)
45	12/09/01 memo from Tim Hatke to Sales Reps responsible for Androgel re: Andropause Consensus 2000 video distribution (D004958)
46	Androgel Brand Data Sheet for POA II 2002 (SOLCID0074801 – SOLCID0074808)
47	Script to aid in Androgel sales (K00536 – K00538)
48	“Androgen Replacement in Hypogonadal Men” by Dr. Larry Lipshultz (D02459 - D02483)
49	06/25/04 monthly report for June from David Sharpe to Christa Townsend (SOLCID0102798 – SOLCID0102802)
50	09/2005 letter to David Sharpe recapping speaker program led by Dr. Ramon Perez (SOLCID0065377)
51	07/25/04 monthly report for July from David Sharpe to Christa Townsend (SOLCID0102815 – SOLCID0102820)
52	04/11/03 memo from AndroGel Brand Team to Primary Care & Specialized Markets Team forwarding AACE Guidelines “American Association of Clinical Endocrinologists Medical Guidelines for Clinical Practice for the Evaluation and Treatment of Hypogonadism in Adult Male Patients” (SOLCID0027758)
53	Mid POA II and Androgel Pump Launch sales guide (SOLCID0100504 – SOLCID0100508)
54	05/26/04 monthly report for May from David Sharpe to Christa Townsend (SOLCID0105656 – SOLCID0105660)
55	08/25/04 monthly report for August from David Sharpe to Christa Townsend (SOLCID0105466 – SOLCID0105471)
56	05/11-12/05 field contact report from Jill Reed (SOLCID0065389 – SOLCID0065394)
57	2005 Field Sales Performance Appraisal of Stephanie Boeke (SOLCID0106350 – SOLCID0106357)
58	Portion of article by Harrison G. Pope, Jr. “Testosterone Gel Supplementation for Men with Refractory Depression: A Randomized, Placebo-Controlled Trial” (SOLCID0028987)
59	Sales Aid “How Are Your Male Patients Performing?” (SOLCID0026989 – SOLCID0026993)
60	2000 Promotional Materials Approval to Print, Psych Sales Aid for Androgel (SOLCID0156709)
61	07/24/01 email to sales reps re: Androgel references in program with Dr. Cunningham (SOLCID0172383)
62	Sales “script” re: Androgel (G-001260 – G-001261)
63	Portion of presentation with sales tips for Androgel (D02803 - D02822)
64	Email chain re: discussing linking Androgel prescriptions with Viagra (SOLCID0101757 – SOLCID0101758)

65	Androgen Patient Counseling tearsheets (SOLCID0074148 – SOLCID—74155 and KD00989 – KD00990)
66	Portion of May 2002 Managed Care Newsletter. References Androgel prescriptions to women (SOLCID0101507)
67	02/01/06 field contact report from Laura Wheat to David Sharpe (SOLCID0068558 – SOLCID0068562)
68	11/04/03 memo from Melanie Blanchard to sales reps re: promotion of Androgel in pain management clinics (SOLCID0003874)
69	Sales Aid “Considerations for your male HIV+ patients” (KD00685 – KD00688)
70	Article from The American Journal of Medicine “Endocrine Disorders in Men Infected with Human Immunodeficiency Virus” (SOLCID0036856 – SOLCID0036861)
71	Summary chart listing the data for fifteen female Texas Medicaid patients prescribed Androgel
72	Report of sales rep Arnold de la Fuente giving doctor off-label pitch and Medicaid claims data for patient prescribed AndroGel by doctor receiving pitch (SOLCID0102815-0102820)
73	Field Sales Performance Appraisal for Cheryl Kramer (SOLCID0106358 – SOLCID0106364)
74	Summary chart of Androgel prescriptions written by Dr. Twenty-five
75	Androgel Medicaid prescriptions written by Dr. Fifteen
76	Summary chart of representative examples of doctors prescribing Androgel for depression
77	Summary chart of representative examples of doctors prescribing Androgel for osteoporosis
78	Summary chart of representative examples of doctors prescribing Androgel for sexual dysfunction
79	08/14/01 letter to Sales Reps from CMS re: launch of Evidence for Secondary Stroke Prevention: Findings from PROGRESS CME (D00963 – D00964)
80	Return on Investment form showing \$26,000 spent on CME event (SOLCID0072161 – SOLCID0072162)
81	10/14/03 email from Suzanne Starbuck to Steve Goldstein re: changes to Androgel promotional CD-Rom (SOLCID0032494 – SOLCID0032496)
82	11/29/99 email from Thomas Dovel re: Cape Fear weekly reports (D005068)
83	Invitation for Obsessive Compulsive & Spectrum Disorders lecture hosted by Solvay (SOLVACID0011735 – SOLVACID0011736)
84	Speaker Request Form for physician speech concerning Luvox (SOLVACID0011742)
85	02/01/00 monthly report from Tom Camp to Ed Schutter with Aceon sales results (SOLCID0010992 – SOLCID0010994)
86	12/06/99 email from Ed Rohrer re: availability of Dr. Hyman for Solvay cities program (SOLCID0069620)
87	Field Sales Self Appraisal for Dana Hargrove (SOLCID0174378 –

	SOLCID0174385)
88	Birmingham District Speaker Funding Request June and July, 2000 Previously Committed Events. Includes information use of Dr. Broder in speaker program (K00388 – K00393)
89	Information re: Gerald Kumin M.D.'s participation in spreading Aceon message. Includes Dr. Kumin's presentation materials (K00003 – K00031)
90	03/07/01 email from Bullington re: Aceon sales tips (K00542 – K00543)
91	Primary Care Central Region March Monthly Business Update listing Medicaid formulary access as a competitive challenge (G-000895 – G- 000908)
92	DM Business Plan Summary Presentation for Nashville District (D002791 – D002799)
93	02/03/05 email from David Sharpe re: Texas Medicaid DART data (SOLCID0099912 – SOLCID0099914)
94	Documents re: Luvox marketing after approval for formulary status under Kentucky Medicaid. (SOLCID0015255 – SOLCID0015258 & SOLCID0015264 – SOLCID0015266)
95	02/22/02 District Business Plan Summary Presentation from Birmingham District (D02775 – D02790)
96	Letter to Union Positiva (Miami doctors) re: AndroGel off-label messages concerning benefits for men with HIV/AIDS (SOLCID0112623 – SOLCID0112626)
97	05/31/06 email from Timothy Stoops to Shammy Chowdhury and others re: physicians prescribing Androgel to patients covered by the Federal Employee Program (SOLCID0068413)
98	Marketing material re: Androgel's status on Medicare Part D (SOLCID0080728 – SOLCID0080732)
99	08/01/02 email from James Prasch to Stanley Ferrell and others re: Aceon's status on Louisiana's Preferred Drug List (D02688 – D02689)
100	Solvay promotional materials re: Medi-Cal's addition of Luvox Tablets to Formulary (SOLCID0017325 – SOLCID0017332)
101	Email chain re: positioning Aceon as drug of choice for stroke patients with Alabama Medicaid (K2095 – K2096)
102	Agreements from recruited physicians re: ACES program (SOLCID0011071, SOLCID0011019 & SOLCID0011073 – SOLCID0011095)
103	Promotional material review re: ADAP (SOLCID0028391 – SOLCID0028408)
104	List of targeted TriCare physicians – Androgel prescribers (KD00857 – KD00858)
105	List of Birmingham District Speaker Events from 01/01/00 – 07/31/00 (K2352)
106	2002 Peer Influence Event Schedule. Includes information on lunch and learns, dinners, golf tournaments, etc. (D02597 – D02598)
107	January – June 2001 – YTD Peer Influence Report. Includes information on preceptorships and other programs (D00164 – D00168)

108	South Central Specialty Region 2001 Business Plan (K00472 – K00484)
109	Schedule of Events for lecture promoting Androgel to HIV patients (SOLCID0070819 – SOLCID0070822)
110	10/08/01 email from Shaji Durrani to MTA-Field PC DM forwarding 2002 Androgel budget. Includes program descriptions and budgets (K00369 – K00371)
111	Territory-Level Program Plan – POA I 2000. Includes information on journal club, dine ‘n dash, book ‘n dash programs (K00645 – K00646)
112	Aceon Territory Action Plan re: Aceon (KD00491 – KD00492)
113	02/13/00 email from John King re: peer influence programs (K00407 – K00411)
114	CME CaseXchange Newsletter Case Study Submission Form for Prevention of Secondary Stroke (KD00720)
115	05/30/02 Solvay Primary Care Field Trip Report by Frank Garcia (G-000855 – G-000857)
116	04/03/02 Solvay Primary Care Field Trip Report by Michelle Thomas (G-000912 – G-000913)
117	05/18/00 email from John King to Narendra Gupta re: speaker program at Beau Rivage Casino in Mississippi (K00394 – K00396)
118	03/09/00 email from John King re: Aceon roundtables (K00400)
119	2002 Business Plan for Aceon (SOLCID0049366 – SOLCID0049415)
120	03/28/01 email from John King re: ALERT roundtable meetings (K00406)
121	Program materials promoting Androgel for treatment of sexual dysfunction (SOLCID0027458 – SOLCID0027475)
122	ALERT Program Workshop presentation (D02484 – D02505)
123	03/20/00 memo from Atul Laddu to sales reps re: ACT program (KD000084 – KD000085)
124	Description of Physician Profile Interview program (KD00277 – KD00280)
125	01/30/00 ACES Consultation letter (KD00719)
126	10/18/99 email from Ed Rohrer re: ACES enrollment (SOLCID0011061 – SOLCID0011067)
127	Consultancy Agreement Interactive Representative Training Program (SOLCID0011056 – SOLCID0011058 and KD00696 – KD00698)
128	02/14/02 email from Christa Townsend to John King re: sample distribution (K00571 – K00572)
129	04/04/02 email from Alvin Reine to John King re: Dine and Dashes (K00574)
130	02/07/00 email from John King re: Books-A-Million program (K00412)
131a	Summary chart of representative examples of speaker programs
132	Summary chart of representative examples of doctors prescribing Aceon
133	Summary chart of representative examples of doctors prescribing Androgel
134	Presentation regarding targeting the right customers using ICD-9 Codes (G-000031 – G0000041)
135	Instructional document “How to Code for Hypogonadism”

	(SOLCID0142747)
136	Presentation re: targeting the right customers for Androgel and the use of ICD-9 Codes (G-000053 – G-000060)
137	Androgel ALERT Program Check Request form (KD00090 – KD00091)
138	Form consulting agreement letter between Unimed and physicians (KD00352 – KD00354)
139	Performance review of Ed Rohrer (SOLCID0000440 – SOLCID0000450)
140	Aceon Launch Marketing Ideas (KD00687 – KD00694)
141	Invitation to OCD Spectrum Concept Advisory Panel at the Homestead Resort in Hot Springs, Virginia (SOLVACID0011688 – SOLVACID011689)
142	March 2000 Cost Center Accounting Report (SOLCID0010868 – SOLCID0010890)
143	Medicare Enrollment Application
144	February 2000 List of Southwest Region check requests for payment to physician speakers (SOLCID0011001 – SOLCID0011003)